

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Kathleen Earley, : Chapter 13
Debtor : Case No.: 17-14140-jkf

ADDENDUM TO CHAPTER 13 PLAN

The Debtor, Kathleen Earley, by and through her attorney, Stephen V. Bottiglieri, Esquire, hereby files this Addendum to her Chapter 13 Plan filed on September 25, 2018 at Document number 80 as follows:

Part 9: Non Standard or Additional Plan Provisions is amended to add the following paragraphs:

Payment of Arrearages

The arrearages on Claim 8 filed by Bayview shall be paid at the time of settlement on the sale of 300 Battersea Road, Ocean City, New Jersey as part of the secured claim.

Proceeds from the Sale of Property(ies)

After the payment of Secured Claims and costs of sale, the Trustee shall then pay allowed priority claims then general unsecured claims from the sale proceeds prior to any other distributions from the sale proceeds.

Respectfully submitted:

BOTTIGLIERI LAW, LLC

Dated: December 18, 2018

BY: /s/ Stephen V. Bottiglieri
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